

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

FILED

SEP - 1 2004

UNITED STATES OF AMERICA )

V. )

GALE NETTLES )

**DOCKETED**  
SEP 02 2004

No. 04 CR 699

MICHAEL W DOBINS  
CLERK, U.S. DISTRICT COURT

Violations: Title 18, United  
States Code, Sections 2, 471,  
473, 844(f)(1), 844(i) and  
2339A

JUDGE BUCKLO  
**04 CR 699**

COUNT ONE

The SPECIAL MARCH 2004 GRAND JURY charges: **MAGISTRATE JUDGE DENLOW**

Beginning in or about December 2003, and continuing until on  
or about August 5, 2004, at Chicago, in the Northern District of  
Illinois, Eastern Division,

GALE NETTLES,

defendant herein, attempted to damage and destroy by means of fire  
and an explosive a building owned and possessed by the United  
States, namely, the Everett M. Dirksen building in Chicago,  
Illinois;

In violation of Title 18, United States Code, Section  
844(f)(1).

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COUNT TWO

The SPECIAL MARCH 2004 GRAND JURY charges:

Beginning in or about December 2003, and continuing until on or about August 5, 2004, at Chicago, in the Northern District of Illinois, Eastern Division,

GALE NETTLES,

defendant herein, attempted to damage and destroy by means of fire and an explosive a building used in interstate commerce and in an activity affecting interstate commerce, namely, the Everett M. Dirksen building in Chicago, Illinois;

In violation of Title 18, United States Code, Section 844(i).

COUNT THREE

The SPECIAL MARCH 2004 GRAND JURY further charges:

On or about August 5, 2004, at Chicago, in the Northern District of Illinois, Eastern Division,

GALE NETTLES,

defendant herein, attempted to provide material support and resources, namely, in excess of one thousand pounds of ammonium nitrate fertilizer, intending that they be used in preparation for and in carrying out a violation of Title 18, United States Code, Sections 844(f) (maliciously damaging or destroying, or attempting to damage or destroy, by means of fire or an explosive, any building, vehicle, or other personal or real property in whole or in part owned or possessed by, or leased to, the United States, or any department or agency thereof), 844(i) (maliciously damaging or destroying, or attempting to damage or destroy, by means of fire or an explosive, any building, vehicle, or other personal or real property used in interstate or foreign commerce or in any activity affecting interstate or foreign commerce), and 1114 (killing or attempting to kill any officer or employee of the United States or of any branch of the United States Government including any member of the uniformed services while such officer or employee is engaged in or on account of the performance of official duties);

In violation of Title 18, United States Code, Sections 2339A and 2.

COUNT FOUR

The SPECIAL MARCH 2004 GRAND JURY further charges:

Beginning no later than on or about May 22, 2004, and continuing until at least on or about July 17, 2004, at Chicago, in the Northern District of Illinois, Eastern Division,

GALE NETTLES,

defendant herein, with the intent to defraud, falsely made, forged and counterfeited obligations of the United States, namely, Federal Reserve Notes;

In violation of Title 18, United States Code, Section 471.

COUNT FIVE

The SPECIAL MARCH 2004 GRAND JURY further charges:

On or about May 22, 2004, at Chicago, in the Northern District of Illinois, Eastern Division,

GALE NETTLES,

defendant herein, sold, exchanged, transferred and delivered false, forged, counterfeited and altered obligations of the United States, namely, five hundred sixty dollars (\$560) in Federal Reserve Notes in the denomination of twenty dollars (\$20), with the intent that the same be passed, published and used as true and genuine;

In violation of Title 18, United States Code, Section 473.

COUNT SIX

The SPECIAL MARCH 2004 GRAND JURY further charges:

On or about May 27, 2004, at Chicago, in the Northern District of Illinois, Eastern Division,

GALE NETTLES,

defendant herein, sold, exchanged, transferred and delivered false, forged, counterfeited and altered obligations of the United States, namely, one thousand five hundred dollars (\$1500) in Federal Reserve Notes in the denomination of twenty dollars (\$20), with the intent that the same be passed, published and used as true and genuine;

In violation of Title 18, United States Code, Section 473.

COUNT SEVEN

The SPECIAL MARCH 2004 GRAND JURY further charges:

On or about May 28, 2004, at Chicago, in the Northern District of Illinois, Eastern Division,

GALE NETTLES,

defendant herein, sold, exchanged, transferred and delivered false, forged, counterfeited and altered obligations of the United States, namely, three thousand six hundred eighty dollars (\$3680) in Federal Reserve Notes in the denomination of twenty dollars (\$20), with the intent that the same be passed, published and used as true and genuine;

In violation of Title 18, United States Code, Section 473.

COUNT EIGHT

The SPECIAL MARCH 2004 GRAND JURY further charges:

On or about July 7, 2004, at Chicago, in the Northern District of Illinois, Eastern Division,

GALE NETTLES,

defendant herein, sold, exchanged, transferred and delivered false, forged, counterfeited and altered obligations of the United States, namely, fifty-two thousand three hundred dollars (\$52,300) in Federal Reserve Notes in the denomination of one hundred dollars (\$100), with the intent that the same be passed, published and used as true and genuine;

In violation of Title 18, United States Code, Section 473.



COUNT NINE

The SPECIAL MARCH 2004 GRAND JURY further charges:

On or about July 17, 2004, at Chicago, in the Northern District of Illinois, Eastern Division,

GALE NETTLES,

defendant herein, sold, exchanged, transferred and delivered false, forged, counterfeited and altered obligations of the United States, namely, nine thousand dollars (\$9000) in Federal Reserve Notes in the denomination of one hundred dollars (\$100), with the intent that the same be passed, published and used as true and genuine;

In violation of Title 18, United States Code, Section 473.

SENTENCING ALLEGATIONS

The SPECIAL MARCH 2004 GRAND JURY charges:

1. The allegations of Counts One through Nine of this Indictment are realleged and incorporated by reference as if fully restated herein for the purpose of alleging sentencing allegations.

2. With regard to Counts One, Two and Three, charging

GALE NETTLES,

defendant herein, with violations of Title 18, United States Code, Sections 2, 844(f)(1), 844(i) and 2339A:

(a) the offenses involved the attempted destruction of a government facility and a place of public use (U.S.S.G. § 2K1.4(a)(1)(B));

(b) the offenses were intended to cause death and serious bodily injury (U.S.S.G. § 2K1.4(c)(1)); and

(c) the object of the offenses would have constituted first degree murder (U.S.S.G. § 2A2.1(a)(1)).

3. With regard to Counts Two and Three, charging

GALE NETTLES,

defendant herein, with violations of Title 18, United States Code, Sections 2, 844(i) and 2339A, the offenses involved, and were intended to promote, federal crimes of terrorism (U.S.S.G. § 3A1.4).

4. With regard to Counts Four through Nine, charging

GALE NETTLES,

defendant herein, with violations of Title 18, United States Code, Sections 471 and 473:

(a) the total face value of the counterfeit items exceeded \$30,000 (U.S.S.G. §§ 2B5.1(b)(1)(B) and 2B1.1(b)(1)(D));

(b) defendant GALE NETTLES manufactured and produced counterfeit obligations of the United States, and possessed and had custody of and control over counterfeiting devices and materials used for counterfeiting (U.S.S.G. § 2B5.1(b)(2)(A)); and

(c) the offenses involved, and were intended to promote, federal crimes of terrorism (U.S.S.G. § 3A1.4).

5. With regard to Counts One through Nine, charging

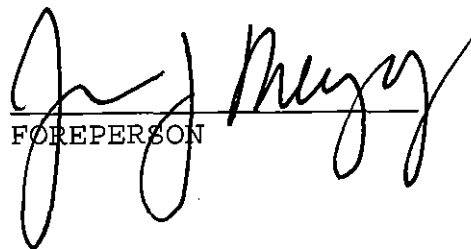
GALE NETTLES,

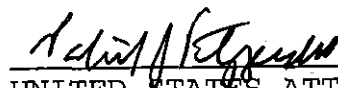
defendant herein, with violations of Title 18, United States Code, Sections 2, 471, 473, 844(f)(1), 844(i), and 2339A:

(a) defendant GALE NETTLES committed the offenses while under a criminal justice sentence, namely, supervised release (U.S.S.G. § 4A1.1(d)); and

(b) defendant GALE NETTLES committed the offenses less than two years after release from imprisonment on a sentence exceeding one year and one month (U.S.S.G. § 4A1.1(e)).

A TRUE BILL:

  
FOREPERSON

  
UNITED STATES ATTORNEY

No. 04 CR 699

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

VS.

GALE NETTLES

I N D I C T M E N T

Violation(s): Title 18 United States Code Sections 844(f)(1), 844(i), 2339A, 471 and 473

A true bill,

Foreman

Filed in open court this

day of

September, A.D. 2004

Clerk

MICHAEL W. DOBBINS

Bail, \$